

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

INVESTMENT ADVISERS ACT OF 1940
Release No. 3680 / September 25, 2013

ADMINISTRATIVE PROCEEDING
File No. 3-15523

In the Matter of

YUSAF JAWED,

Respondent.

**ORDER INSTITUTING
ADMINISTRATIVE PROCEEDINGS
PURSUANT TO SECTION 203(f) OF THE
INVESTMENT ADVISERS ACT OF 1940,
MAKING FINDINGS, AND IMPOSING
REMEDIAL SANCTIONS**

I.

The Securities and Exchange Commission (“Commission”) deems it appropriate and in the public interest that public administrative proceedings be, and hereby are, instituted pursuant to Section 203(f) of the Investment Advisers Act of 1940 (“Advisers Act”) against Yusaf Jawed (“Respondent”).

II.

In anticipation of the institution of these proceedings, Respondent has submitted an Offer of Settlement (the “Offer”) which the Commission has determined to accept. Solely for the purpose of these proceedings and any other proceedings brought by or on behalf of the Commission, or to which the Commission is a party, Respondent consents to the Commission’s jurisdiction over him and the subject matter of these proceedings and to the entry of this Order Instituting Administrative Proceedings Pursuant to Section 203(f) of the Investment Advisers Act of 1940, Making Findings, and Imposing Remedial Sanctions (“Order”), as set forth below.

III.

On the basis of this Order and Respondent's Offer, the Commission finds that:

1. Yusaf Jawed, age 44, is a resident of Portland, Oregon. Jawed served as the principal of Grifphon Asset Management, LLC and Grifphon Holdings, LLC. Grifphon Asset Management and Grifphon Holdings are Oregon limited liability companies and investment advisers not registered with the Commission. They served as advisers to various hedge funds formed by Jawed, including Grifphon Alpha I Fund, L.P. and the Alpha Qualified Fund, L.P.

2. On September 20, 2012, the Commission filed a complaint against Jawed in the matter SEC v. Jawed, et al., Civil Case No. 3:12-cv-01696-PK, in the United States District Court for the District of Oregon. On September 11, 2013, a final judgment was entered by consent against Jawed, permanently enjoining him from future violations of Section 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5 thereunder, Section 17(a) of the Securities Act of 1933, and Sections 206(1), 206(2), and 206(4) of the Investment Advisers Act of 1940 and Rule 206(4)-8 thereunder. Jawed was also ordered to pay \$26,980,349 in disgorgement of ill-gotten gains from investors' funds, and \$6,929,625 in prejudgment interest.

3. The Commission's complaint alleged that, in connection with the offer and sale of hedge fund investments sold as interests in limited partnerships, Jawed made false and misleading statements to investors about how money was invested, sent out false account statements and other information indicating false performance, misappropriated investor money, and engaged in other conduct that operated as a fraud and deceit.

4. On April 16, 2013, the United States District Court for the District of Oregon, in United States v. Yusaf Jawed, Case No. 3:13-cr-00125-HA, entered an Order Entering Plea accepting Jawed's guilty plea to five counts of mail fraud in violation of Title 18 United States Code, Sections 2 and 1341, and twelve counts of wire fraud in violation of Title 18 United States Code, Sections 2 and 1343.

5. The counts of the criminal information to which Jawed pled guilty alleged, inter alia, that Jawed devised a scheme to defraud investors by means of materially false and fraudulent representations to induce them to invest, and that he used mail and wires to carry out the scheme.

IV.

In view of the foregoing, the Commission deems it appropriate and in the public interest to impose the sanctions agreed to in Respondent Jawed's Offer.

Accordingly, it is hereby ORDERED pursuant to Section 203(f) of the Advisers Act that Respondent Jawed be, and hereby is:

barred from association with any investment adviser, broker, dealer, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization.

Any reapplication for association by the Respondent will be subject to the applicable laws and regulations governing the reentry process, and reentry may be conditioned upon a number of factors, including, but not limited to, the satisfaction of any or all of the following: (a) any disgorgement ordered against the Respondent, whether or not the Commission has fully or partially waived payment of such disgorgement; (b) any arbitration award related to the conduct that served as the basis for the Commission order; (c) any self-regulatory organization arbitration award to a customer, whether or not related to the conduct that served as the basis for the Commission order; and (d) any restitution order by a self-regulatory organization, whether or not related to the conduct that served as the basis for the Commission order.

By the Commission.

Elizabeth M. Murphy
Secretary